

Matthew G. McHenry, OSB 04357
Levine & McHenry LLC
1001 S.W. Fifth Avenue, Suite 1414
Portland, Oregon 97204
503-546-3927
email: matthew@levinemhenry.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,) No. 3:16-cr-00051-BR-12
)
Plaintiff,) MOTION FOR MODIFICATION OF
)
vs.) PROBATION CONDITIONS
)
SEAN ANDERSON,)
)
Defendant.)

Defendant Sean Anderson, through his attorney Matthew G. McHenry, respectfully moves for an order modifying his conditions of probation to strike the requirement that Mr. Anderson submit to periodic urinalysis testing. There is no evidence that Mr. Anderson has any sort of substance abuse problem, and his crime of conviction—trespassing—is unrelated to any use or possession of controlled substances.

I have spoken to AUSA Craig Gabriel, USPO (Idaho) Lisa Melchert, USPO Eileen Groshong, and USPO Jaret Osigawara about this motion, and all parties are unopposed to the modification. As provided by Rule 32.1(b), Mr. Anderson elects to proceed on this motion without a hearing. This

motion is based on the records of the case and the accompanying declaration of counsel.

Respectfully Submitted this 25th day of August, 2017:

/s/ Matthew G. McHenry
Matthew G. McHenry
Counsel for Sean Anderson